

RE: DOREEN D MCLEAN

) Case No. 19 B 23483  
)  
Debtor ) Chapter 13  
)  
) Judge: JACK B SCHMETTERER

**NOTICE OF MOTION**

DOREEN D MCLEAN

CUTLER & ASSOC

via Clerk's ECF noticing procedures

1615 FOWLER AVE  
EVANSTON, IL 60201

Please take notice that on November 13, 2019 at 11:00 am my designee or I will appear before the Honorable Judge JACK B SCHMETTERER at 219 South Dearborn Courtroom 682, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on October 21, 2019.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On August 20, 2019 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend Schedule I to complete Part 1, remove general assistance, provide proof of income and proof of contribution along with proof that daughter and sister have the ability to contribute and amend Plan as follows: Part 2.3 insert tax refund language, 3.2 list the collateral, 4.4 increase the amount to be paid, Part 8 correct name of creditor as per its proof of claim.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

/s/ Tom Vaughn

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
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